



**MCI Telecommunications  
Corporation**

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Donald F. Evans  
Vice President  
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**RECEIVED**

**NOV 6 1996**

November 6, 1996

**FX PARTE OR LATE FILED**

Federal Communications Commission  
Office of Secretary

William F. Caton  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

**DOCKET FILE COPY ORIGINAL**

Re: CC Docket No. 95-116 - Local Number Portability

Dear Mr. Caton:

On Wednesday, November 6, I met with Mindy Littel, Carol Matthey, Jeannie Su and Susan McMaster all of the Common Carrier Bureau to discuss issues regarding the above subject.

During the meeting, I was asked if MCI planned to have LECs perform queries and I responded in the negative. In addition, I stated that to the extent MCI should request LECs to perform queries, we would expect to pay a reasonable charge for such.

Please place a copy of this notice in the attached which was used in the meeting in the record of this proceeding.

Sincerely,

Donald F. Evans

Attachment

cc: M. Littel  
C. Matthey  
J. Su  
S. McMaster

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# Local Number Portability

- Local Exchange Carriers have misled the FCC
  - claims of network reliability
  - claims that only their customers are impacted
  - costs of deployment

# Local Number Portability

## Claims of Network Reliability

- LECs say LRN will harm the network
  - no LEC has presented any specific, potential harm
  - Their claim is solely based on number of queries the SS7 network will handle
- LECs say QOR is more reliable
  - Their claim is solely based on number of queries the SS7 network will handle
  - They don't tell the FCC about issues with QOR release message

# Local Number Portability

## **LRN v. QOR - Just the facts**

- LRN requires all interoffice local calling area calls to be subjected to a query to obtain proper routing instructions
  - Non-ported intraoffice calls do not require query
- QOR required all interoffice local calling are calls to be subjected to a SS7 message or query to either complete the call or obtain proper routing instructions
  - Non-ported intraoffice calls do not require as SS7 message on a query

# Local Number Portability

## **LRN v. QOR - Just the facts - cont'd**

- SS7 protocol must be modified to process LRN queries
- SS7 protocol must be modified to process QOR messages
  - Protocol must be modified to handle release messages
  - Tables must be maintained in switches to handle call values in release messages
- LRN handles all calls in the same manner - competitively neutral

# Local Number Portability

## **LRN v. QOR - Just the facts - cont'd**

- QOR subjects all calls to competitive LEC customers to additional network processing to obtain routing instructions - not competitively neutral

# Local Number Portability

- Engineers can design SS7 network for LRN since query volume is a known value
- Engineers can only guess design of QOR network since query volume is not known
  - Always in a reactive mode which can lead to calls destined to competitive LEC network being blocked
  - Large increase in queries not engineered into overcall demand cause significant network reliability concerns

# Local Number Portability

## **QOR Release Messages**

- Tables must be developed and maintained in each switch
  - QOR release messages call value must be mapped to tables to trigger LRN query
  - Over 50 call values must be maintained
  - If all call values do not trigger LRN query, calls to competitive LEC will not be processed
  - Originating network provider maintains tables



# Local Number Portability

## **QOR Release Messages - cont'd**

- If release message call value triggers LRN query and number has not been ported another SS7 message must be launched to the terminating switch
  - If terminating switch is in a congestion status additional messages will increase congestion and harm network reliability